



DEPARTMENT OF PUBLIC UTILITIES

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**WATER RIGHTS
SALT LAKE**

THOMAS M. DOLAN
MAYOR

BYRON JORGENSON
CHIEF ADMINISTRATIVE OFFICER

JUDITH M. BELL
DIRECTOR

June 1, 1999

Robert L. Morgan, P.E.
State Engineer
Division of Water Rights
1594 West North Temple, Suite 220
P.O. Box 146300
Salt Lake City, Utah 84114-6300

Re: Draft Salt Lake County Groundwater Management Plan

Dear Mr. Morgan:

Sandy City hereby provides written comment regarding the proposed Salt Lake County Groundwater Management Plan.

The water rights information utilized by the Division of Water Rights for the analysis regarding potential diversions does not appear to reflect recent changes to several water rights. We recommend that an updated water right listing be provided to the affected entities so that the entities can better assess the impacts of the proposed plan.

The proposed plan assumes constant transmissivity throughout the aquifer. Consideration should be given to reflect the variable nature of transmissivity throughout the aquifer and the various "management squares".

Sandy City is concerned that the proposed potential diversions may result in a reduction in the total volume of diversions that Sandy City is entitled to based on existing water rights that are limited by flow rate only. Water rights held by public water suppliers should be allowed to divert water based on the maximum flow rate of the water rights. Sandy City water rights are critical to the future expansion of the city and any reductions would be detrimental.

A mechanism to handle water introduced into the aquifer by means of Aquifer Storage and Recovery programs should be identified and developed.

The southern boundary of the proposed subregion in the east side of the Salt Lake Valley appears to be approximately 11000 South (southern line of Sections 13-18 Township 3 South Range 1 East). This excludes one Sandy City water right (57-8094) from the majority of the area encompassing Sandy City. We suggest that the southern boundary line be changed to